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24 January 2017

## **Submission – Major Land Transaction, Lease of Portion of Tompkins Park**

Dear Sir

The Urban Bushland Council WA Inc. (UBC) is a peak community conservation body with 76 member groups. It focusses on the protection and appropriate environmental management of remnant native vegetation in and around the Perth Metropolitan Area and other urban centres. The group has been active for over two decades and has been involved in research projects and community education in addition to its core advocacy activities.

Of key interest to the UBC is *Bush Forever*.

Bush Forever is an implementation plan and a whole of government initiative designed to identify, protect and manage regionally significant bushland in order to achieve a sustainable balance between conservation of our bushland and development in metropolitan Perth.

The policy framework aims to protect the biodiversity of bushland by protecting *at least 10%* of each of the 26 Heddlé vegetation complexes of the Swan Coastal Plain portion of the Perth Metropolitan Region. This amounts to about 18% of the original vegetation on the Swan Coastal Plain. It is designed to achieve a 'Comprehensive, Adequate and Representative ('CAR') reserve system for the region according to commonwealth guidelines.

Bush Forever Sites are representative of regional ecosystems and habitat and play a central role in the conservation of Perth's unique biodiversity. This network of sites also requires connectivity and conservation of locally significant bushland by local governments.

Aiming to secure long-term protection of biodiversity and associated environmental values, Bush Forever policy recognises the protection and management of significant bushland areas as a **fundamental consideration in planning processes at all levels of government**.

The proposal under consideration is of particular interest as it is planned to be *located in Alfred Cove in Bush Forever Site 331*. Hence our response to your invitation to comment on the above proposal and business case advertised in accordance with section 3.59 (4) of the Local Government Act 1995.

The Site of vegetated wetland impacted by the proposed development is of both Regional and International significance as follows.

**1. Saltmarsh value: Alfred Cove retains the only relatively natural and extensive estuarine wetland saltmarsh on the lower Swan River Estuary. This is a very special natural value which must be retained and protected.**

**2. Rare Vegetation type:** Its floristic community type is the Vasse Vegetation Complex, of which less than 1% remains in the Region.

**3. EPBC Act listing as TEC: Its coastal salt-marsh has been listed federally as a Threatened Ecological Community.** This is a very significant environmental factor which must be respected by the City of Melville and State authorities.

**4. Bird species richness:** Some **132 species of bird have been recorded** at the site, including threatened species. Alfred Cove is considered to be one of the most important waterbird habitats in the south-west. The area forms a part of a network of wetlands including the chain of wetlands to the south and Rottnest Island salt lakes. The mud flats are the main feeding area for waders on the lower estuary and are linked closely, as a resource, with Pelican Point and the Como foreshore (Milyu).

**5. International significance: Thirty bird species are covered by international agreements** for the protection of species habitat. The area is used as a staging/holding area for intercontinental migratory wader species whose numbers are diminishing through habitat loss.

**6. Ecological connectivity:** The tree-covered areas of the Cove form a corridor for bush birds in their north-south migration and also facilitate nomadic movements. The river is a flight path for birds and also provides a route for species moving from inland areas to the coastal plain and Rottnest.

**7. History of threats:** Various past planning decisions – eg housing developments, refuse tips, transport corridors - have already placed enormous pressures on the biodiversity of this unique Site.

Rather than reducing these pressures and taking steps to conserve, protect and improve the condition of the Alfred Cove area of BFA 331, the proposed new development of a surf sports, recreation and leisure facility introduces additional stresses and prevents required remedial efforts. This proposal is within the Bush Forever Area and this means that the primary land use should be for conservation and restoration of environmental values – in this case migratory and saltmarsh bird habitat.

The development proposal in this location within a Bush Forever Area is totally unacceptable.

## **Conclusion**

1. The buffer of riparian vegetation along the River at that place is extremely narrow – approximately one tree wide or less in places – and does not meet the recommended width for such an important wetland. Climate change is anticipated to exacerbate this

as an issue. As the proposed new development will take place on crown land designated as land to be drawn in to the conservation estate to (in part) ameliorate this problem, the UBC opposes the development.

2. The ground area to be utilised in the construction as 'hard surface' is *significantly* larger than what is currently the case, reducing the area of green space at the site. As the proposed footprint is not sympathetic to the recognised environmental values to be conserved, the UBC opposes the development.
3. Additional environmental disturbance factors will be introduced through the size, design, location and purposes of the facility. As these will adversely impact on both the diversity of wildlife and the capacity of wildlife to use the area for habitat, the UBC opposes the development.
4. Groundwater resources are diminishing at an alarming rate across the Perth Metropolitan Area, requiring strategies to limit and reduce groundwater extraction. The impact of lowering water tables and the influx of salt water into fresh water aquifers has caused great concern and the impact on our bush land has been disastrous. This saltwater intrusion is another highly significant environmental factor. As this new project will use at least as much (if not more) groundwater as in the past and now 'unacceptable' practice, the UBC opposes the development.

We also commend to you the submission by our member group SERAG.

Representatives of the Urban Bushland Council are willing to discuss these important matters further with you. Please contact us by telephone at our office on 9420 7207, or if unattended, contact our Secretary Margaret on 9381 1287 to arrange a meeting.

Yours sincerely

President

cc SERAG  
DPAW Threatened species and communities  
Birdlife Australia WA  
OEPA  
Wetlands Conservation Society